

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

CR 24-197 ECT/LIB
INDICTMENT

Plaintiff,	18 U.S.C. § 2252(a)(4)(B)
	18 U.S.C. § 2252(b)(2)
v.	18 U.S.C. § 2253
	21 U.S.C. § 853(p)
LUCAS MATHEW KRAMER,	28 U.S.C. § 2461(c)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

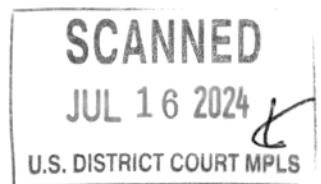
COUNT 1
(Possession of Child Pornography)

On or about December 14, 2023, in the State and District of Minnesota, the defendant,

LUCAS MATHEW KRAMER,

did knowingly possess one or more matters which contained visual depictions that had been shipped and transported using a means and facility of interstate commerce, including by computer, and had been mailed, shipped and transported in and affecting interstate commerce, where the production of such visual depictions involved the use of a minor under the age of 12 years old engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer files located on a Samsung Galaxy S20+ and a Samsung Galaxy S9+ cell phone:

- (a) a video with a file name ending in “cc122b.mp4” that is approximately 1 minute and 54 seconds in length and depicts a prepubescent girl wearing a pink Winnie-the-Pooh shirt as she performs oral sex on an adult male penis;



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- (b) a video with a file name ending in “694ddal.mp4” that is approximately 39 seconds long and depicts a pubescent female performing oral sex on an adult male penis;
- (c) an image with a file name ending in “6991020.0” that depicts an adult male using his hands to force a prepubescent girl to place her mouth on the adult’s penis;
- (d) a video with a file name ending in “b0d6633.mp4” that is approximately 1 minute and 2 seconds long and depicts an adult female performing oral sex on a male toddler before forcing the toddler’s penis into her vagina;
- (e) a video with a file name ending in “af9d430.mp4” that is approximately 50 seconds long and depicts an adult male performing anal sex on a female toddler.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures. If convicted of Count 1 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a): (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, data disc, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including a Samsung Galaxy S20+ phone with IMEI

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number 354551110090184 and Samsung Galaxy S9+ phone with IMEI number 353322091235060.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON